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May 17, 2024

VIA CM/ECF

Honorable Robyn F. Tarnofsky
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Kamran Khodakhah v. Montefiore Health System et al
Case No.: 1:24-cv-00839-LAK-RFT

Dear Judge Tarnofsky,

We write on behalf of the parties in furtherance of the Court's April 30, 2024 Directive (ECF #34) for Plaintiff to file an Amended Complaint on or before May 17, 2024. On May 17, 2024 at approximately 12:30 p.m., Plaintiff received new information which he believes likely will require substantial additions to the Amended Complaint. The undersigned has conferred with counsel for all Defendants who do not oppose a 30-day extension. Plaintiff proposes filing his Amended Complaint on or before June 17, 2024. The parties further request the opportunity to submit a proposed briefing schedule following the filing of Plaintiff's Amended Complaint.

Respectfully submitted,
NESENOFF & MILTENBERG, LLP

/s/ Stuart Bernstein
Stuart Bernstein

Plaintiff's time to amend the complaint is extended through **June 17, 2024**.

By **June 24, 2024**, the parties shall file on the docket a proposed briefing schedule for Defendants' anticipated motion to dismiss. No further extension of the deadline to amend the complaint will be granted absent good cause shown.

The Clerk of Court is respectfully requested to terminate ECF 35.

Dated: May 17, 2024
New York, NY

SO ORDERED


ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE